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June 24, 2024

The Honorable Ellen L. Hollander
United States District Judge for
the District of Maryland
101 West Lombard Street,
Baltimore, Maryland 21201

Re: United States v. Jacky McComber
Case No. 21-036

Dear Judge Hollander:

We write in advance of Ms. McComber's sentencing hearing, which is scheduled to begin on Wednesday, June 26, 2024. During a status conference on April 30, 2024, this Court noted that Ms. McComber's daughter is going to be married on November 1, 2024.¹ The court requested that undersigned counsel to inform the Court if—in the event that the Court imposes a sentence of incarceration—Ms. McComber would request a delayed self-surrender date.

This letter is to confirm that in light of her daughter's wedding, and the extended time that Ms. McComber has spent on pretrial release without incident, undersigned counsel will request a self-surrender date of January 7, 2025. Counsel requests this date so that Ms. McComber can spend a final holiday at home prior to reporting.

Although this is a lengthy period prior to self-surrender, this is an unusual case. Ms. McComber's Initial Appearance in this matter was on March 21, 2021, and the government informed Ms. McComber of its investigation several years prior to indictment. As Ms. McComber's pretrial release report reflects, she has complied with all pretrial conditions of release imposed at her initial appearance.

We thank you for your consideration.

¹ November 1, 2024 is four months and four days after June 28, 2024, the final day scheduled for Ms. McComber's sentencing.

Respectfully,

/s/
Patricia Richman
Assistant Federal Public Defender

cc: Jefferson Gray, AUSA (ECF)